

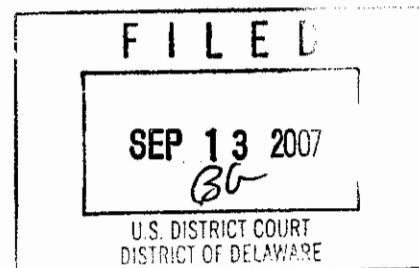
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

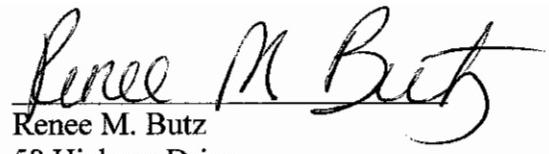
RENEE M. BUTZ,)
Plaintiff,)
v.)
LAWNS UNLIMITED, LTD. and)
EDWARD FLEMING,)
Defendants,)
Civ. No. 05-495-JJF
Judge Joseph J. Farnan Jr.

MOTION TO EXTEND DISCOVERY

Plaintiff, hereby move to extend the discovery period, and in support thereof, state the following:

1. During Plaintiff's deposition of Defendants', Defendant introduced new information with regards to their defense that was previously not provided to Plaintiff.
 2. Plaintiff requests extension of discovery to enable Plaintiff to obtain documents that would either prove or disprove Defendant's statement.
 3. Discovery has been extended twice before at the request of the Defendant's counsel.
 4. The current discovery period has been ordered to be completed by September 21, 2007
 5. Plaintiff requests the Court to revise the current Scheduling Order to extend the discovery period for another thirty (30) days.





Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 9/11/07

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORDER

AND NOW, this _____ day of _____ 2007, the Court
having heard and duly considered Plaintiff's Motion to Extend Discovery, **IT IS**
HEREBY ORDERED as follows:

Discovery shall be extended for another thirty (30) days on the date this Order is entered, and shall remain open for a period of one month. Dispositive motions shall be served and filed with an opening brief on or before the expiration of thirty (30) days from the close of discovery, at which time briefing shall continue pursuant to D. Del. LR 7.1.2. Any discovery unsuccessfully attempted during the previous discovery period shall be re-served.

United States District Judge

Date: _____, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

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)

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LAWNS UNLIMITED LTD. and
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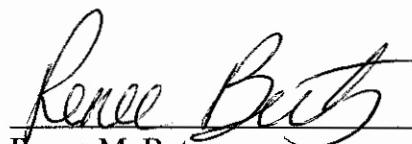
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Civ. No. 05-495-JJF
Judge Joseph J. Farnan Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion to Extend Discovery were sent by first-class United States mail, postage duly paid, on this 11th day of September, 2007, to counsel of record as follows:

Margaret M. DiBianca
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building, 17th Floor
100 West Street
Wilmington, DE 19801



Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 9/11/07

Rene Butz
Sgt. Major Dr.
NE MO 3101



RECORDED
S. S. T. DISTRICT COURT

Attn: Judge Faran
3, Caleb Boggs
844 N. King Street
Wilmington DE 19801

